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January 25, 2022

Sent via ECF

Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMORANDUM ENDORSED

Re: U.S. v. Moazu Kromah, et al., 19 Cr. 338 (GHW)

Dear Judge Woods:

I represent Amara Cherif pursuant to the Criminal Justice Act (CJA) in the above-captioned matter. This matter is scheduled to commence trial on July 11, 2022, and to continue for approximately 2 - 3 weeks.

I write to respectfully request that the Court appoint Thomas Dunn as co-counsel to assist me in this matter as this case involves complicated issues and voluminous discovery in connection with the alleged counts of conspiracy, international trafficking of protected wildlife and narcotics, and money laundering. Mr. Dunn and I have tried multiple cases together and I expect that Mr. Dunn's involvement in this case will substantially assist in providing the best defense team to Mr. Cherif. I further request that Mr. Dunn receive the new standard CJA rate of \$158 for appointed counsel as he has been a member of the SDNY CJA Panel for many years.

For the Court's convenience, I have included a "So Ordered" line should the Court grant our request. Thank you for your time and consideration.

Respectfully submitted,

s/ Jacqueline E. Cistaro

cc: All Counsel of Record (*via ECF*)

Application denied without prejudice. The Plan for Furnishing Representation Pursuant to the Criminal Justice Act adopted by the Southern District of New York on September 25, 2019 provides that the Court may appoint more than one CJA counsel in "an extremely difficult case" where "the Court finds that it is in the interest of justice and so states . . ." CJA Plan § VII.C.4. The Court appreciates the nature of this case--that it is complex and difficult. But the CJA Plan requires a showing that a case is "extremely difficult." The information presented here, and the argument that additional counsel will substantially assist in trial preparation does not meet that high bar.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 117.
SO ORDERED.

Dated: January 26, 2022
New York, New York


GREGORY H. WOODS
United States District Judge